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Date: 7/7/2009 12:12 PM
Subject: Iron Mountain Solar Energy Study (CREZ 37)

Clare Laufenberg Gallardo

California Energy Commission

1516 Ninth Street, MS 46

Sacramento, CA 95814

I am writing on behalf of the Native American Land Conservancy (NALC), an intertribal, 501c(3) organization established in 1998 to acquire, preserve, and protect Native American traditional cultural lands, sites, areas, and resources. We are writing with our concern for the Iron Mountain Solar Energy Study Area (CREZ 37) as part of the Renewable Energy Transmission Initiative.

The NALC has a number of programs and projects in southern California, including the ownership of 2,500 acres in the Old Woman Mountains in the Ward Valley (the Old Woman Mountains Preserve). The entities involved in the work of the NALC include tribal members and Councilpersons from the Chemehuevi, Cahuilla, and Kumeyaay communities and, through our Salt Song Project, members of the Southern Paiute tribes. Our partnerships include work with the Bureau of Land Management, the U.S. Fish and Wildlife Service and conservation groups including the Trust for Public Lands and institutions of higher learning including the University of California (Riverside and Irvine). Our work connects us with tribal communities from San Diego County east to the Colorado River and north to Nevada and Utah. We are also working with the Desert Manager's Group and will be represented at their August meeting.

The Iron Mountain Competitive Renewable Energy Zone (CREZ) would have a significant impact on the OWMP that could not be mitigated, especially in terms of cultural resources in and around the Preserve. These impacts include, but are not limited to, view shed; sensitive cultural sites, areas, and resources; ground water extraction; transmission lines; threatened and endangered species; and, habitat fragmentation. The Iron Mountain CREZ is located near BLM designated Desert Wildlife Management Areas (DWMA)s and the Chemehuevi Critical Habitat Unit for the desert tortoise (*Gopherus agassizii*). I should note that, to the best of our knowledge, neither the NALC nor the 29 Palms Band of Mission Indians (a member-tribe of the NALC) received notice of the proposed RETI and designation of the Iron Mountain CREZ and that the State of California should begin formal consultation with the affected tribes. We are asking that tribal representatives, including representatives from the NALC be

invited to the Stakeholder Steering Committee (SSC) and would be available to participate in conference calls associated with the project. Our preliminary suggestion is that the CEC only concentrate on already disturbed areas for solar projects. No projects should be considered if they are in proximity to an Area of Critical biological and cultural resources. We are also asking that the tribes and the NALC be consulted entities during the NEPA process.

If you wish to learn more about the NALC please visit our website (currently being revised) at www.nalc4all.org

We look forward to hearing from you soon on this matter.

Respectfully yours,

Kurt W. Russo, Ph.D.
Executive Director
Native American Land Conservancy